

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

PAUL JONES,

Plaintiff,

v.

MONTACHUSETT REGIONAL TRANSIT
AUTHORITY

Defendant.

Civil No.1:20-cv-12076

Civil No.419-cv-11093

20250123 PM 4:25:15 DC

NOTICE TO THE COURT

Paul Jones, the Plaintiff and Deborah Eckers hereby submits this Proposed Scheduling Orders as directed by the Court on January 6, 2025.

The Plaintiff initiated the process by sending a draft Proposed Joint Scheduling Order to the defendants' attorney on January 21, 2025. After discussions and revisions, the parties agreed to submit separate Proposed Joint Scheduling Orders for each case.

Attorney Rich David, representing HB Software Solutions, Inc. (HBSS), has stated their disagreement with the assertion that HBSS is "back in the case pursuant to the First Circuit's decision" and stated he declined to participate in filing the scheduling order". See Email Exhibit

1.

The attached Proposed Scheduling Order reflects the positions of the Plaintiff and attorney Deborah Eckers separately. The Plaintiff opposes Summary Judgment and requests the Court to permit discovery. While attorney Eckers contends that the Plaintiff has already received discovery, the Plaintiff maintains that only limited discovery related to Chapter 151B and Title VII employment status has been provided. The attorney Deborah Eckers in the state court refused to provide plaintiff with any discovery and I just filed a Summary Judgment as none was really needed and the results was a jury will only make a final decision if MART is a transportation company other than that I have never received any discovery or given the opportunity for full discovery on any counts and was never afforded discovery for any TCPA. The Plaintiff asserts that full discovery on all counts, including TCPA, has not been conducted.

Due to technical constraints in editing the PDF attorney Eckers provided to me regarding the Proposed Scheduling order I had to add this in the cover page, this cover page has been created to accompany the attached PDFs sent by attorney Eckers on January 23, 2025, at 3:35 PM, I asked for word documents but she refused to answer my email on January 23, 2025, so I am submitting as is so the court order will only be a day late.

/s/ Paul Jones
Paul Jones
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Springfield, Ma 01109
617-939-5417
Pj22765@gmail.com

CERTIFICATE OF SERVICE

I, Paul Jones the plaintiff , hereby certify that on this 23rd day of January 2025, I served the attached Documents via e-mail to the following attorney of record.

/s/ Paul Jones
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